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Site:
Break: 3.10
Other:

4774

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET N.E.
ATLANTA, GEORGIA 30365

August 9, 1994

4WD-SSRB

Jeff D. Wyatt
Senior Environmental Engineer
Chevron Chemical Company
6001 Bollinger Canyon Road
San Ramon, CA 94583-0947

SUBJ: EPA Review
Draft Remedial Investigation (RI) Report
Chevron Chemical NPL Site - Orlando, FL

Dear Mr. Wyatt:

Enclosed please find additional EPA review comments regarding the document noted above. Comments from the State of Florida have been incorporated into the enclosed comments. Please revise the draft RI accordingly and provide a separate letter response addressing all review comments regarding the draft RI.

As we have discussed, it would be helpful to conduct a conference call or meeting to ensure consistency between the RI, Risk Assessment, and Feasibility Study. I will contact you as soon as the draft Risk Assessment has been reviewed. We can then arrange a suitable time for a meeting. If you have any questions, please contact me at (404) 347-2643, ext. 6241.

Sincerely,

Randy Bryant

Randy Bryant
Senior Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Susan Tobin, TASK Environmental

ENCLOSURE
ADDITIONAL REVIEW COMMENTS ON DRAFT RI REPORT
CHEVRON CHEMICAL NPL SITE

1. It would be helpful to provide a set of maps showing concentrations of site contaminants in areas where soil has not been removed. These maps should show the footprints of the former buildings on the Site. Such information may be helpful to the State as it evaluates the remedial actions completed to date.

2. Tables such as 1-1 and 4-3 should be reviewed and revised to ensure that contaminants present above MCLs or other risk-based levels are properly identified. The frequency of detection and the detection limits for the groundwater contaminants should also be reviewed to ensure that the contaminants of concern are properly identified. Consistency with the draft Risk Assessment, currently under review by EPA, will be necessary.

3. Table 2-2 lists the substances used in the biodegradation experiments. Please add further text explaining how these substances are representative of the existing groundwater conditions at the Site. Methanol was not found in groundwater, but was used in the experiments and could act as an additional food source for the microorganisms, resulting in nonrepresentative biological growth. Other parameters found in groundwater were not used in the experimental mixture.

4. Section 2.2.4 describes the use of the SUTRA model. Both the input and output files should be included in the final RI report to aid in a comprehensive review of the report.

   Also, given that dispersivity and porosity values used in the model are not site-specific but are based on literature values, it may be useful to conduct a sensitivity analysis for these parameters. A sensitivity analysis may be of use for some of the model boundary conditions where constant heads were specified for areas where the water table may not be constant.

5. Section 3.3.1 refers to the pumping test and its effect on the deeper aquifer. Please provide any additional data to support the conclusion that the deep aquifer is not connected to the surficial aquifer.

6. Section 6.2 refers to some remnant zones of the petroleum layer floating on the shallow aquifer. These areas may act as ongoing sources for groundwater contamination and should be further discussed in the RI and FS.